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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THOMAS DAWSON REUTER and
DULCE VICTORIA GALINDO FELIX,

Plaintiff,

v.

ANTONY BLINKEN, U.S. Secretary of
State; ERIC S. COHAN, Consul General,
U.S. Consulate in Ciudad Juarez, Mexico;
ALEJANDRO MAYORKAS, Secretary of
U.S. Department of Homeland Security;
MERRICK B. GARLAND, U.S. Attorney
General, in their Office Capacities,

Defendants.

Case No. 2:20-cv-02180-JCM-BNW

**Stipulation and Order for Extension
of Time**

(First Request)

Plaintiffs Thomas Dawson Reuter and Dulce Victoria Galindo Felix, and Defendants Antony Blinken, U.S. Secretary of State; Eric S. Cohan, Consul General, U.S. Consulate in Ciudad Juarez, Mexico; Alejandro Mayorkas, Secretary of U.S. Department of Homeland Security; and Merrick Garland, U.S. Attorney General (“Defendants”) hereby stipulate and agree that Defendants may have a 30-day extension of time, from September 14, 2021 to October 14, 2021, to reply to Plaintiff’s Response in Opposition to Defendants’ Motion to Dismiss (ECF No. 31).

1 An extension is needed because defense counsel only recently learned she will need
 2 to undergo a medical procedure that will require at least two and a half weeks of recovery.
 3 Under the circumstances, good cause exists to extend the time for Defendants to reply to
 4 Plaintiff's Response in Opposition to Defendants' Motion to Dismiss. *See* Fed. R. Civ. P.
 5 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for*
 6 *good cause*, extend the time...with or without motion or notice if the court acts, or if a request
 7 is made, before the original time or its extension expires[.]") (emphasis added).

8 This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must
 9 advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this
 10 extension request, and he has advised that he does not oppose the request. This stipulation
 11 is made in good faith and not for the purpose of undue delay.

12 Dated: September 9, 2021.

13 LAW OFFICE OF FELIPE D.J.
 14 MILLAN, P.C.


CHRISTOPHER CHIOU
 Acting United States Attorney

15 /s/ Felipe D.J. Millan
 16 *FELIPE D.J. MILLAN*
 17 Attorney for Plaintiffs

/s/ Holly A. Vance
 HOLLY A. VANCE
 Assistant United States Attorney

18 **DATED:** September 9, 2021

IT IS SO ORDERED:

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 20 JAMES C. MAHAN
 UNITED STATES DISTRICT JUDGE